

**EXHIBIT 1**



**CITY OF ST. LOUIS  
LAW DEPARTMENT  
1200 MARKET STREET, ROOM 314  
ST. LOUIS, MO 63103-2864  
(314) 622-3361**

**JULIAN L. BUSH  
CITY COUNSELOR**

**LYDA KREWSON  
MAYOR**

September 14, 2020

Jim Wyrsh  
Javad Khazaeli  
Kiara Drake  
Khazaeli Wyrsh  
911 Washington Ave.  
Suite 211  
Saint Louis, Missouri 63101

Re: *Megan Green v. City of St. Louis, et al.*, Case No. 18-CV-1629

Jim,

We have done additional investigation into the location of SWAT officers on the night of September 15, 2017. Through that investigation, we can state that Sgt. Cliff Sommer, Sgt. Joseph Calabro, and Officer Daniel Cora, along with previously identified Officer Bennie Blackmon were on the BEAR at the time that chemical munitions were deployed. We cannot state which officer actually deployed any munitions out of the BEAR. We can also definitively state that Officers James Zwilling, Glennon Friggerio, James Wurm, Daniel Book, Mark Seper, Aaron Mueller, Brandon Moore were not on the BEAR that night. Similarly, Sgt. John Jones and Sgt. Michael Scego were not on the BEAR at any point that night. There is one officer whom we believe might have been on the BEAR that night, but due to a medical-related absence, we have not been able to confirm.

Accompanying this letter are supplemental discovery responses that reflect this information to the extent that it is responsive to one or more of the interrogatories.

Very truly yours,

*/s/ Brandon Laird*

Brandon Laird  
Associate City Counselor

Cc: Abby Duncan  
Robert Dierker  
Amy Raimondo

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MEGAN ELLYIA GREEN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 4:18-cv-01629-JCH
	)	
CITY OF SAINT LOUIS, MISSOURI, et al.	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF ST. LOUIS'S  
THIRD SUPPLEMENTAL RESPONSES TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant, City of St. Louis, hereby provides the following responses and objections to Plaintiff's First Set of Interrogatories.

**PLAINTIFF'S INTERROGATORIES**

1. Identify the full name, rank and position, badge number and/or department serial number, gender, race, height, and weight of each of the front line officers, supervisors, and command staff on duty responding to the protests at or near the intersection of Lindell Boulevard and Kingshway Boulevard, on the evening of September 15, 2017 or the early hours of September 16, 2017, the locations at which each person was posted, and their responsibilities, if such responsibilities were individualized.

**Response: Defendants object to Plaintiff's request for the height and weight of every front line officer, supervisor, and command staff on duty on September 15, 2017 as unduly burdensome. As to Plaintiff's remaining requests, please see the documents produced as Bates stamped CITY 000990-001067.**

**2nd Supplement:** Additionally, please see the SWAT Duty Roster Worksheet for September 15, 2017, produced as CITY 004962-004963.

2. Identify the full name of each officer who deployed chemical munitions at or near the intersections of Lindell Boulevard and Kingshighway Boulevard and Lindell Avenue and Euclid Avenue, on the evening of September 15, 2017 or the early hours of September 16, 2017.

**Response:** Defendants are currently unaware of the identity of which officers deployed chemical munitions at or near those intersections.

3. Identify the full name of each officer occupying the MRAP, or otherwise identified armored or tactical vehicle, shown in GREEN.000001 and GREEN.000002.

**Response:** Defendants' investigation is ongoing but Defendants are currently unaware of which officers occupied the MRAP.

**1st Supplement:** Defendants' investigation is ongoing. At present time, Defendants are aware that Officer Bennie Blackmon occupied the MRAP the evening of September 15, 2017. Defendants are unaware of which other officers, if any, were occupying the MRAP at the time depicted in GREEN.000001 and GREEN.000002.

**2nd Supplement:** As a point of clarification, the vehicle depicted in GREEN.000001 and GREEN.000002 is a BEAR, not a "MRAP."

**3rd Supplement:** Defendant states that at least the following officers were on the BEAR in addition to Officer Blackmon listed above:

- Sgt. Clifford Sommer, DSN 5167
- Sgt. Joseph Calabro, DSN 4393
- Officer Daniel Cora DSN 8784

Respectfully submitted,  
JULIAN L. BUSH  
CITY COUNSELOR

/s/ Brandon Laird  
Brandon Laird, 65564 MO  
Assistant City Counselor  
lairdb@stlouis-mo.gov  
Amy Raimondo 71291MO  
Assistant City Counselor  
raimondoa@stlouis-mo.gov  
Robert H. Dierker 23671MO  
Associate City Counselor  
dierkerr@stlouis-mo.gov  
Abby Duncan 67766 MO  
Assistant City Counselor  
Megan Bruyns 69987MO  
Assistant City Counselor  
1200 Market St.  
City Hall, Rm 314  
St. Louis, MO 63103  
314-622-3361  
Fax 314-622-4956  
*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on Monday, September 14, 2020, the foregoing responses were supplemented by email to:

Javad M. Khazaeli  
javad.khazaeli@kwlawstl.com

James R. Wyrsh  
james.wyrsh@kwlawstl.com

Kiara N. Drake  
kiara.drake@kwlawstl.com

/s/ Brandon Laird  
Brandon Laird  
Associate City Counselor